

FILED

1 Thomas P. Riley, SBN 194706
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3 First Library Square
4 1114 Fremont Avenue
5 South Pasadena, CA 91030-3227

2013 SEP -9 PM 2: 13

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

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9 Attorneys for Plaintiff
10 Innovative Sports Management, Inc.

11
12 UNITED STATES DISTRICT COURT
13 FOR THE
14 CENTRAL DISTRICT OF CALIFORNIA
15 WESTERN DIVISION

16 INNOVATIVE SPORTS MANAGEMENT,
17 INC.,

18 CV 13-06587-TJH
Case No.: (PC/Ax)

19 Plaintiff,

20 COMPLAINT

21 vs.

22 MARIA ANA GRANILLO DEBETHKE
23 A/K/A MARIA ANA GRANILLO,
24 individually and d/b/a EL BUEN GUSTO,

25 Defendant.

26 PLAINTIFF ALLEGES:

27 JURISDICTION

28 1. Jurisdiction is founded on the existence of a question arising under particular statutes. This action is brought pursuant to several federal statutes, including the Communications Act of 1934, as amended, Title 47 U.S.C. 605, *et seq.*, and The Cable & Television Consumer Protection and Competition Act of 1992, as amended, Title 47 U.S. Section 553, *et seq.*, and California B&P Section 17200, a California state statute.

1
2. This Court has jurisdiction of the subject matter of this action pursuant to 28 U.S.C.
3 Section 1331, which states that the District Courts shall original jurisdiction of all civil actions
4 arising under the Constitution, laws, or treaties, of the United States. This Court has subject matter
jurisdiction over the state law claims pursuant to 28 U.S.C. § 1337 (supplemental jurisdiction).

5
6. This Court has personal jurisdiction over the parties in this action as a result of the
7 Defendant's wrongful acts hereinafter complained of which violated the Plaintiff's rights as the
8 exclusive commercial domestic distributor of the televised fight *Program* hereinafter set forth at
length. The Defendant's wrongful acts consisted of the interception, reception, publication,
9 divulgence, display, exhibition, and tortious conversion of said property of Plaintiff within the
10 control of the Plaintiff in the State of California constituting an unfair business practice in violation
11 of the law, including specific California state statutes, more particularly set forth below.

12

13 **VENUE**

14 4. Pursuant to Title 47 U.S.C. Section 605, venue is proper in the Central District of
15 California, because a substantial part of the events or omissions giving rise to the claim occurred in
16 this District and/or because, *inter alia*, Defendant reside within the State of California (28 U.S. C.
17 § 1391 (b) and 28 U.S.C. § 84(c)(2)).

18

19 **INTRADISTRICT ASSIGNMENT**

20 5. Assignment to the Western Division of the Central District of California is proper
21 because a substantial part of the events or omissions giving rise to the claim occurred in Los
22 Angeles County and/or the United States District Court for the Central District of California has
23 decided that suits of this nature, and each of them, are to be heard by the Courts in this
particular Division.

24 **THE PARTIES**

25 6. Plaintiff, Innovative Sports Management, Inc. is, and at all relevant times mentioned was, a
26 New Jersey corporation with its principal place of business located at 720 Monroe Street, Suite
27 303, Hoboken, New Jersey 07030.

28 ///

1 7. Defendant Maria Ana Granillo Debethke a/k/a Maria Ana Granillo is an owner, and/or
2 operator, and/or licensee, and/or permittee, and/or person in charge, and/or an individual with
3 dominion, control, oversight and management of the commercial establishment doing business as
4 El Buen Gusto operating at 3140 Glendale Boulevard, Los Angeles, California 90039.

5 8. Defendant Maria Ana Granillo Debethke a/k/a Maria Ana Granillo is the sole individual
6 specifically identified on the California Alcoholic Beverage and Control license issued for El Buen
7 Gusto (ABC #452789).

8 9. Plaintiff is informed and believes, and alleges thereon that on September 11, 2012 (the
9 night of the *Program* at issue herein, as more specifically defined in paragraph 14), Defendant
10 Maria Ana Granillo Debethke a/k/a Maria Ana Granillo had the right and ability to supervise the
11 activities of El Buen Gusto, which included the unlawful interception of Plaintiff's *Program*.

12 10. Plaintiff is informed and believes, and alleges thereon that on September 11, 2012 (the
13 night of the *Program* at issue herein, as more specifically defined in paragraph 14), Defendant
14 Maria Ana Granillo Debethke a/k/a Maria Ana Granillo, as the sole individual specifically
15 identified on the liquor license for El Buen Gusto, had the obligation to supervise the activities of
16 El Buen Gusto, which included the unlawful interception of Plaintiff's *Program*.

17 11. Plaintiff is informed and believes, and alleges thereon that on September 11, 2012 (the
18 night of the *Program* at issue herein, as more specifically defined in paragraph 14), Defendant
19 Maria Ana Granillo Debethke a/k/a Maria Ana Granillo personally, or by specifically directed the
20 employees of El Buen Gusto to unlawfully intercept and broadcast Plaintiff's *Program* at El
21 Buen Gusto. The actions of the employees of El Buen Gusto are directly imputable to Defendant
22 Maria Ana Granillo Debethke a/k/a Maria Ana Granillo by virtue of her ownership of El Buen
23 Gusto.

24 12. Plaintiff is informed and believes, and alleges thereon that the unlawful broadcast of
25 Plaintiff's *Program*, as supervised and/or authorized by Defendant Maria Ana Granillo Debethke
26 a/k/a Maria Ana Granillo, resulted in increased profits for El Buen Gusto.

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28

COUNT I

(Violation of Title 47 U.S.C. Section 605)

13. Plaintiff Innovative Sports Management, Inc., hereby incorporates by reference all of the allegations contained in paragraphs 1-12, inclusive, as though set forth herein at length.

14. Pursuant to contract, Plaintiff Innovative Sports Management, Inc., was granted the exclusive nationwide commercial distribution (closed-circuit) rights to the *El Salvador v. Guyana Soccer Game*, telecast nationwide on Tuesday, September 11, 2012 (this included all interviews bouts and game commentary encompassed in the television broadcast of the event, hereinafter referred to as the "Program").

15. Pursuant to contract, Plaintiff Innovative Sports Management, Inc., entered into subsequent sublicensing agreements with various commercial entities throughout North America, including entities within the State of California, by which it granted these entities limited sublicensing rights, specifically the rights to publicly exhibit the *Program* within their respective commercial establishments in the hospitality industry (i.e., hotels, racetracks, casinos, bars, taverns, restaurants, social clubs, etc.).

16. As a commercial distributor and licensor of sporting events, including the *Program*, Plaintiff Innovative Sports Management, Inc., expended substantial monies marketing, advertising, promoting, administering, and transmitting the *Program* to its customers, the aforementioned commercial entities.

17. With full knowledge that the *Program* was not to be intercepted, received, published, divulged, displayed, and/or exhibited by commercial entities unauthorized to do so, each and every one of the above named Defendant, either through direct action or through actions of employees or agents directly imputable to Defendant (as outlined in paragraphs 7-12 above), did unlawfully intercept, receive, publish, divulge, display, and/or exhibit the *Program* at the time of its transmission at her commercial establishment in Los Angeles, California located at 3140 Glendale Boulevard, Los Angeles, California 90039.

18 Said unauthorized interception, reception, publication, exhibition, divulgence, display,

1 and/or exhibition of the Program by the Defendant was done willfully and for purposes of direct
2 and/or indirect commercial advantage and/or private financial gain.
3

4 19. Title 47 U.S.C. Section 605, *et seq.*, prohibits the unauthorized publication or use of
5 communications (such as the transmission of the *Program* for which Plaintiff Innovative Sports
Management, Inc., had the distribution rights thereto).
6

7 20. By reason of the aforesaid mentioned conduct, the aforementioned Defendant, violated
8 Title 47 U.S.C. Section 605, *et seq.*
9

10 21. By reason of the Defendant's violation of Title 47 U.S.C. Section 605, *et seq.*, Plaintiff
11 Innovative Sports Management, Inc., has the private right of action pursuant to Title 47 U.S.C.
12 Section 605.
13

14 22. As the result of the aforementioned Defendant's violation of Title 47 U.S.C. Section 605,
15 and pursuant to said Section 605, Plaintiff Innovative Sports Management, Inc., is entitled to the
16 following from the Defendant:
17

18 (a) Statutory damages for each willful violation in an amount to
19 \$100,000.00 pursuant to Title 47 U.S.C. 605(e)(3)(C)(ii), and also
20 (b) the recovery of full costs, including reasonable attorneys' fees,
21 pursuant to Title 47 U.S.C. Section 605(e)(3)(B)(iii).
22

23 **WHEREFORE, Plaintiff prays for judgment as set forth below.**
24

25 **COUNT II**
26

27 **(Violation of Title 47 U.S.C. Section 553)**
28

29 23. Plaintiff's hereby incorporates by reference all of the allegations contained in paragraphs 1-
30 22, inclusive, as though set forth herein at length.
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32 ///
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24. The unauthorized interceptions, reception, publication, divulgence, display, and/or exhibition of the *Program* by the above named Defendant was prohibited by Title 47 U.S.C. Section 553, *et seq.*

25. By reason of the aforesaid mentioned conduct, the aforementioned Defendant violated Title 47 U.S.C. Section 553, *et seq.*

26. By reason of the Defendant's violation of Title 47 U.S.C. Section 553, *et seq.*, Plaintiff Innovative Sports Management, Inc., has the private right of action pursuant to Title 47 U.S.C. Section 553.

27. As the result of the aforementioned Defendant's violation of Title 47 U.S.C. Section 553, Plaintiff Innovative Sports Management, Inc., is entitled to the following from Defendant:

- (a) Statutory damages for each violation in an amount to \$10,000.00 pursuant to Title 47 U.S.C. § 553(c)(3)(A)(ii); and also
- (b) Statutory damages for each willful violation in an amount to \$50,000.00 pursuant to Title 47 U.S.C. § 553(c)(3)(B); and also
- (c) the recovery of full costs pursuant to Title 47 U.S.C. Section 553 (c)(2)(C); and also
- (d) and in the discretion of this Honorable Court, reasonable attorneys' fees, pursuant to Title 47 U.S.C. Section 553 (c)(2)(C).

WHEREFORE, Plaintiff prays for judgment as set forth below.

COUNT III
(Conversion)

28. Plaintiff's hereby incorporates by reference all of the allegations contained in paragraphs 1-27, inclusive, as though set forth herein at length.

1 29. By their aforesaid acts of interception, reception, publication, divulgence, display, and/or
2 exhibition of the *Program* at her commercial establishment at the above-captioned address, the
3 aforementioned Defendant, tortuously obtained possession of the *Program* and wrongfully
4 converted same for their own use and benefit.

5 30. The aforesaid acts of the Defendant was willful, malicious, egregious, and intentionally
6 designed to harm Plaintiff Innovative Sports Management, Inc., by depriving Plaintiff of the
7 commercial license fee to which Plaintiff was rightfully entitled to receive from them, and in doing
8 so, the Defendant subjected the Plaintiff to severe economic distress and great financial loss.

9 31. Accordingly, Plaintiff Innovative Sports Management, Inc., is entitled to both
10 compensatory, as well as punitive and exemplary damages, from aforementioned Defendant as the
11 result of the Defendant's egregious conduct, theft, and conversion of the *Program* and deliberate
12 injury to the Plaintiff.

13 **WHEREFORE, Plaintiff prays for judgment as set forth below.**

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16 **COUNT IV**

17 **(Violation of California Business and Professions Code Section 17200, *et seq.*)**

18 32. Plaintiff hereby incorporates by reference all allegations contained in Paragraphs 1-31,
19 inclusive, as set forth herein at length.

20 33. By contract, Plaintiff Innovative Sports Management, Inc., was granted exclusive domestic
21 commercial exhibition closed-circuit rights to the *Program*.

22 34. Plaintiff did not authorize transmission, interception, reception, divulgence, exhibition, or
23 display of the *Program* to the general public, persons at large, or to the commercial
24 establishment operated by the foregoing Defendant.

25 35. With full knowledge that the Program was not to be intercepted, received, published,
26

1 divulged, displayed, and/or exhibited by commercial entities unauthorized to do so, Defendant
2 either through direct action or through actions of employees or agents directly imputable to
3 Defendant by virtue of his respective position and authority did unlawfully intercept, receive,
4 publish, divulge, display, and/or exhibit the Program at the real time transmission of the *Program's*
5 broadcast at the commercial establishment, as more particularly indicated and identified above.

6 36. Plaintiff is informed and believes and alleges thereon that the Defendant and/or his agents,
7 servants, workmen, or employees performed the aforementioned acts knowingly, willfully and to
8 confer a direct or indirect commercial advantage and/or pirate financial gain to the Defendant, to
9 the detriment and injury of Plaintiff and its business enterprise as a commercial distributor and
10 closed-circuit licensor of sports and entertainment television programming.

11 37. The Defendant's unauthorized interception, publication, divulgence and/or exhibition was
12 done by the Defendant wantonly, recklessly, and without regard whatsoever for the intellectual
13 property rights of the Plaintiff.

14 38. The aforementioned unlawful acts of each of the Defendant constituted, unlawful, untrue,
15 fraudulent, predatory, unfair, and deceptive trade practices, and by reason of the aforementioned
16 conduct, the Defendant, and each of them, violated California and Professions Code Section
17 17200, *et seq.*

18 39. As a proximate result of the aforementioned acts attributable to the Defendant, Plaintiff has
19 been permanently deprived of the patronage of current, previous and potential customers of the
20 sports and entertainment programming it licenses commercially to the hospitality industry, all to its
21 severe financial injury and loss in a sum to be determined at trial.

22 40. By reason of the Defendant's violation of California Business and Professions Code
23 Section 17200, *et seq.*, Plaintiff Innovative Sports Management, Inc. is entitled to restitution for its
24 injuries, the disgorgement and turn-over of the Defendant's ill-gotten gains, as well as injunctive
25 and declaratory relief, from Defendant as may be made more appropriately determined at trial.

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41. Plaintiff is entitled to its attorneys' fees from the Defendant for enforcing California Business and Professions Code Section 17200 as it meets the standards of a private attorney general as specifically and statutorily defined under California Civil Procedure Section 1021.5.

WHEREFORE, Plaintiff prays for judgment as set forth below.

As to the First Count:

1. For statutory damages in the amount of \$110,000.00 against the Defendant and
2. For reasonable attorneys' fees as mandated by statute, and
3. For all costs of suit, including but not limited to filing fees, service of process fees, investigative costs, and
4. For such other and further relief as this Honorable Court may deem just and proper;

As to the Second Count:

1. For statutory damages in the amount of \$60,000.00 against the Defendant and
2. For reasonable attorneys' fees as may be awarded in the Court's discretion pursuant to statute, and
3. For all costs of suit, including but not limited to filing fees, service of process fees, investigative costs, and
4. For such other and further relief as this Honorable Court may deem just and proper.

As to the Third Count:

1. For compensatory damages in an amount according to proof against the Defendant and
2. For exemplary damages against the Defendant, and
3. For punitive damages against the Defendant, and

4. For reasonable attorneys' fees as may be awarded in the Court's discretion pursuant to statute, and;
5. For all costs of suit, including but not limited to filing fees, service of process fee, investigative costs, and;
6. For such other and further relief as this Honorable Court may deem just and proper.

As to the Fourth Count:

1. For restitution to the Plaintiff in an amount according to and from the Defendant, for his ill-gotten gains, and;
2. For declaratory relief, and;
3. For prohibitory and mandatory injunctive relief, and;
4. For reasonable attorneys' fees as may be awarded in the Court's discretion pursuant to statute, and;
5. For all costs of suit, including but not limited to filing fees, service of process fees, investigative costs, and;
6. For such other and further relief as this Honorable Court may deem just and proper.

Dated:

LAW OFFICES OF THOMAS P. RILEY, P.C.
By: Thomas P. Riley
Attorneys for Plaintiff
Innovative Sports Management, Inc.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge Terry J. Hatter, Jr. and the assigned Magistrate Judge is Paul L. Abrams.

The case number on all documents filed with the Court should read as follows:

2:13-CV6587-TJH (PLAx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

September 9, 2013

Date

By MDAVIS

Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:



Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012



Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701



Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CASE NUMBER

CV 13-06587-TJH
(P.C.A.)

Innovative Sports Management,
Inc.,

PLAINTIFF(S),

v.

Maria Ana Granillo Debethke,
(Please see attached.)

DEFENDANT(S).

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney

Thomas P. Riley, Esq. , whose address is:

Law Offices of Thomas P. Riley, P.C.
1114 Fremont Avenue
South Pasadena, CA 91030
Tel: (626) 799-9797

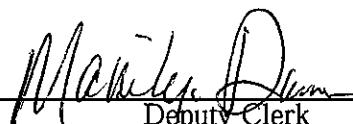
An answer to the COMPLAINT, • AMENDED COMPLAINT,

(1st, 2nd, etc.)

• COUNTERCLAIM, • CROSS-CLAIM which is herewith served upon you within 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

CLERK, U. S. DISTRICT COURT

DATE: SEP - 9 2013

By 
Deputy Clerk

(SEAL OF THE COURT)

**Thomas P. Riley, SBN 194706
LAW OFFICES OF THOMAS P. RILEY, P.C.
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1114 Fremont Avenue
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**Attorneys for Plaintiff
Innovative Sports Management, Inc.**

UNITED STATES DISTRICT COURT
FOR THE
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

INNOVATIVE SPORTS MANAGEMENT, INC.,

Case No.:

COMPLAINT

Plaintiff,

VS.

**MARIA ANA GRANILLO DEBETHKE
A/K/A MARIA ANA GRANILLO,
individually and d/b/a EL BUEN GUSTO,**

Defendant.

PLAINTIFF ALLEGES:

JURISDICTION

1. Jurisdiction is founded on the existence of a question arising under particular statutes. This action is brought pursuant to several federal statutes, including the Communications Act of 1934, as amended, Title 47 U.S.C. 605, *et seq.*, and The Cable & Television Consumer Protection and Competition Act of 1992, as amended, Title 47 U.S. Section 553, *et seq.*, and California B&P Section 17200, a California state statute.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CASE NUMBER

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(PLA)

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be taken against you for the relief demanded in the complaint.

CLERK, U. S. DISTRICT COURT

DATE: SEP - 9 2013

By MARYLYN DAVIS
Deputy Clerk

(SEAL OF THE COURT)



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11 **Attorneys for Plaintiff**
12 **Innovative Sports Management, Inc.**

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CIVIL COVER SHEET

I(a) PLAINTIFFS

Innovative Sports Management, Inc.

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Hudson
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

Maria Ana Granillo Debethke, et al.

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Los Angeles
(IN U.S. PLAINTIFF CASES ONLY)

(c) ATTORNEYS (FIRM NAME, ADDRESS AND TELEPHONE NUMBER)

Thomas P. Riley, SBN# 194706
Law Offices of Thomas P. Riley, P.C.
1114 Fremont Avenue
South Pasadena, CA 91030
Tel: (626) 799-9797

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties In Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR DIVERSITY CASES ONLY)

Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> DEF	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> PTF	<input type="checkbox"/> DEF
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. ORIGIN

1 Original 2 Removed from Proceeding 3 Remanded from State Court 4 Reinstated or Appellate Court 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN CHECK IF THIS IS A CLASS ACTION DEMAND \$ 170,000.00
COMPLAINT: UNDER F.R.C.P. 23Check YES only if demanded in complaint:
JURY DEMAND: YES NOVI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Violation of Telecommunications Statutes 47 USC 553; 47 USC 605

VII. NATURE OF SUIT (PLACE AN x IN ONE BOX ONLY)

OTHER STATUTES	CONTRACT	TORTS	FORFEITURE / PENALTY	BANKRUPTCY
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment Of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury- Med Malpractice <input type="checkbox"/> 365 Personal Injury- Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other
<input type="checkbox"/> 410 Antitrust				<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
<input type="checkbox"/> 430 Banks and Banking				PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 450 Commerce/ICC Rates/etc				SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung(923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 460 Deportation				LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act
<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations				<input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act
<input type="checkbox"/> 810 Selective Service				FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 850 Securities/Commodities/ Exchange				
<input type="checkbox"/> 875 Customer Challenge 12 USC 3410				
<input type="checkbox"/> 891 Agricultural Act				
<input type="checkbox"/> 892 Economic Stabilization Act				
<input type="checkbox"/> 893 Environmental Matters				
<input type="checkbox"/> 894 Energy Allocation Act				
<input type="checkbox"/> 895 Freedom of Information Act				
<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice				
<input type="checkbox"/> 950 Constitutionality of State Statutes				
<input type="checkbox"/> 890 Other Statutory Actions				
	REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	
	<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? No Yes

If yes, list case number(s): _____

CV 13-06587

CIVIL COVER SHEET
(Reverse Side)AFTER COMPLETING THE FRONT SIDE OF FORM JS-44C, COMPLETE THE INFORMATION REQUESTED BELOW.VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? No Yes

If yes, list case number(s): _____

CIVIL CASES ARE DEEMED RELATED IF A PREVIOUSLY FILED CASE AND THE PRESENT CASE:

(CHECK ALL BOXES THAT APPLY)

- A. Appear to arise from the same or substantially identical transactions, happenings, or events;
- B. Involve the same or substantially the same parties or property;
- C. Involve the same patent, trademark or copyright;
- D. Call for determination of the same or substantially identical questions of law, or
- E. Likely for other reasons may entail unnecessary duplication of labor if heard by different judges.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

CHECK HERE IF THE US GOVERNMENT, ITS AGENCIES OR EMPLOYEES IS A NAMED PLAINTIFF.

Hudson

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

CHECK HERE IF THE US GOVERNMENT, ITS AGENCIES OR EMPLOYEES IS A NAMED DEFENDANT.

Los Angeles

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

NOTE: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PROPER): X Date 9/9/13

NOTICE TO COUNSEL/PARTIES: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

NATURE OF SUIT CODE	ABBREVIATION	SUBSTANTIVE STATEMENT OF CAUSE OF ACTION
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))